

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

WINKLEVOSS CAPITAL FUND, LLC,

Plaintiff,

v.

CHARLES SHREM,

Defendant.

Case No.

**AFFIDAVIT OF TYLER MEADE  
IN SUPPORT OF MOTION TO  
SEAL**

**18 CV 8250**

I, Tyler Meade, hereby declare as follows:

1. I am member of the California and New York Bars and Principal at the Meade Firm p.c., counsel for Plaintiff Winklevoss Capital Fund, LLC ("WCF") in the above referenced matter. Except as to matters stated on information and belief, I have personal knowledge of the information referenced herein and could competently testify as to its truth if called to do so. As to matters stated on information and belief, I am informed and believe them to be true.

2. I have served as outside counsel for Cameron and Tyler Winklevoss, and their related entities, since 2011. There has been extensive press coverage in almost every suit filed on behalf of, or against, the Winklevosses. *See, e.g.,* Brandon Gee, *Winklevoss twins prevail on summary judgment in Facebook suit*, MASSACHUSETTS LAWYERS WEEKLY (Jan. 13, 2015), <https://masslawyersweekly.com/2015/01/13/winklevoss-twins-prevail-on-summary-judgment-in-facebook-suit/>.

3. Based on the frequency and extent of press coverage of litigation involving the Winklevoss brothers, and on the notoriety of Charlie Shrem, I believe WCF's Complaint and Ex

Parte Application for Prejudgment Attachment will garner immediate and extensive press coverage upon public filing.

4. A Google news search for "Winklevoss" yields 35,100 results, and a Google news search for "Charlie Shrem" yields 5,310 results.

I declare under penalty of perjury under the laws of the United States and the State of New York that the foregoing is true and correct to the best of my knowledge.

Executed on September 11, 2018 in New York, New York.

  
Tyler Meade